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14  
15 [ADDITIONAL COUNSEL LISTED BELOW]

16 UNITED STATES DISTRICT COURT  
17 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

18 VLAD TSYN, DANIEL SILBERMANN,  
19 LORI BAGWELL, and CATHERINE  
HORAN-WALKER, individually and on  
20 behalf of all others similarly situated,  
Plaintiff,

21 vs.

22 WELLS FARGO ADVISORS, LLC,  
23 Defendant.  
24

Case No. 14-cv-02552-LB

**JOINT STIPULATION AND ~~PROPOSED~~  
ORDER TO MODIFY BRIEFING  
SCHEDULES**

Judge: Hon. Laurel Beeler

Trial Date: None Set

**ADDITIONAL COUNSEL**

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WELLS FARGO ADVISORS, LLC

**STIPULATION**

WHEREAS, Plaintiffs have filed a Motion for Interlocutory Appeal (ECF No. 106), currently set for hearing before this Court on April 14, 2016 at 9:30 a.m.;

WHEREAS, Defendant's response to that motion is currently due on March 23, 2016, and Plaintiffs' reply on March 30, 2016;

WHEREAS, per the agreement of the parties, the Court continued to April 7, 2016 the deadline for filing motions related to (1) conditional certification under the Fair Labor Standards Act ("FLSA") of the remaining FLSA claims; and (2) class certification of the California state law claims under Rule 23. The Court did so with the parties' expressed understanding that they would meet and confer on these deadlines following the now-issued ruling on Plaintiffs' initial motion for conditional certification and Defendant's motions for partial summary judgment. (ECF No. 67);

WHEREAS, the Parties have met and conferred on the above briefing schedules and have agreed to a briefing and hearing schedule on the pending motion as well as a continuance of provisional deadline for motions concerning conditional and class certification (the parties note their intent to meet and confer further after resolution of the pending Motion for Interlocutory Appeal);

WHEREAS, the Parties jointly and respectfully submit that it would best promote judicial and party resources to modify and reset these pending deadlines;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the respective Parties hereto, that: Subject to the approval of the Court, the deadlines in this matter be modified and set as follows:

Case Event	Current Filing Deadline/Hearing Date	Proposed Extended Filing Deadline/Hearing Date
Deadline to File Response to Plaintiffs' Motion for Interlocutory Appeal	3/23/16	3/31/16
Deadline to File Reply ISO Motion for Interlocutory Appeal	3/30/16	4/14/16

Hearing on Motion for Interlocutory Appeal	4/14/16	4/28/16
Deadline for Filing Motions for Conditional Certification and Rule 23 Class Certification	4/7/16	6/23/16

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED: March 22, 2016

WYNNE LAW FIRM  
EDWARD J. WYNNE

By: /s/ EDWARD J. WYNNE

EDWARD J. WYNNE

Attorneys for Plaintiff  
VLAD TYSEN

DATED: March 22, 2016

MUNGER, TOLLES & OLSON LLP

By: /s/ MARJA-LIISA OVERBECK

MARJA-LIISA OVERBECK

Attorneys for Defendant  
WELLS FARGO ADVISORS, LLC

FILER'S ATTESTATION

Pursuant to Local Rule 5-1(i)(3), regarding signatures, I attest that concurrence in the filing of the document has been obtained from each of the other signatories listed above.

~~PROPOSED~~ ORDER

Pursuant to the Parties' Joint Stipulation, it is hereby ORDERED that the case deadlines in this matter be modified as follows:

Case Event	Current Filing Deadline/Hearing Date	Proposed Extended Filing Deadline/Hearing Date
Deadline to File Response to Plaintiffs' Motion for Interlocutory Appeal	3/23/16	3/31/16
Deadline to File Reply ISO Motion for Interlocutory Appeal	3/30/16	4/14/16
Hearing on Motion for Interlocutory Appeal	4/14/16	4/28/16
Filing of Motions re: Conditional Certification and Rule 23 Class Certification	4/7/16	6/23/16

DATED: March 23, 2016

  
HONORABLE LAUREL PEELER